

September 15, 2022

RE: Response to Concurring Motion to Dismiss – **BZA Case No. 20782**

Comes now, Carol Howell, through Counsel, and in response to the Concurring Motion to Dismiss filed herein, states that she reserves all her legal and equitable rights pursuant to the Zoning and other laws, rules, and regulations of the District of Columbia, to notice of the Cargill's filing of revised plans, receipt and review of any such revised plans filed, and objection to revised plans to fully protect her legal and equitable rights as an adjoining/abutting property owner under all zoning and other such laws, rules, and regulations in the District of Columbia that grant and preserve the rights of adjoining/abutting property owners, including but not limited to her rights under 11 DCMR Section A-304.2 *et seq.*

Ms. Howell further reserves her rights, under the District of Columbia Freedom of Information Act to receipt of any and all documents requested in a FOIA request made pursuant to this Appeal, including but not limited to FOIA Request No. 2022-FOIA-08937.

Respectfully submitted,

/s/David F. Hall
David F. Hall – 441229

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of September, 2022 I caused an electronic copy of this document to be served on:

Matthew LeGrant, Zoning Administrator
Office of the Zoning Administrator
Department of Consumer and Regulatory Affairs
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/s/David F. Hall
David F. Hall